

Camellia Baray, State Bar No. 179219
BONJOUR, THORMAN, BARAY & BILLINGSLEY
24301 Southland Dr., Ste 312
Hayward, Ca. 94545
Telephone: (510) 785-8400
Facsimile: (510) 670-0955
camellia@btbandb.com

Attorneys for Defendant Monique Burns

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

No. CR 3-12-mj-70126 MEJ

Plaintiff,

v.

UNOPPOSED MOTION TO MODIFY
RELEASE CONDITIONS;
ORDER MODIFYING CONDITIONS OF
RELEASE

MONIQUE BURNS,

Defendant.

By and through counsel, defendant Monique Burns respectfully requests that her release conditions in this case be modified, as follows:

1. The defendant is permitted to travel to Anaheim, California for a period of five days – July 12, 2012 through and including July 16, 2012.
2. **All other conditions will remain in effect.**

The reason for this request for a modification of travel restrictions is that Ms. Burns would like to accompany her teenage son to a basketball tournament in Anaheim California. Ms.

1 Burns has been a parent volunteer on her son's basketball team for the past several years.

2 Historically, she has traveled with him to his various tournaments and events.

3 Ms. Burns has rented a car for this trip – the make, model and license plate of the vehicle
4 they are using will be provided to Pretrial Services. While in Anaheim, she will be staying at
5 Lemon Tree Hotel, located at 1600 E. Lincoln Ave, phone number (714) 772-0200.
6

7 Pretrial Services Officer Betty Kim has been contacted, and she has no opposition to this
8 modification. In addition, United States Attorney Kevin Barry has been contacted, and he has no
9 objection to the request, given the approval of Pretrial Services.
10

11 The undersigned, Camellia Baray, declares under penalty of perjury that the foregoing is
12 true and correct to the best of her information and belief.
13

14 Dated: July 10, 2012

Respectfully submitted,

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16 BONJOUR, THORMAN,
BARAY & BILLINGSLEY,
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18 /S/
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20 CAMELLIA BARAY
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Plaintiff,

v.

~~PROPOSED~~ ORDER MODIFYING
CONDITIONS OF RELEASE

MONIQUE BURNS,

Defendant.

_____ /

Based on the approval of the parties and good cause appearing therefore, it is
ORDERED that the defendant's release conditions be modified as follows:

1. The defendant be permitted to travel to Anaheim, CA from July 12, 2012 to July
16, 2012.

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Unopposed Motion to Modify Release Conditions
And Proposed Order
No. CR 3-12-mj-70126 MEJ

2. All other conditions will remain in effect.



Dated: July 10, 2012

The Honorable Maria-Elena James
United States Magistrate Judge